

Cargill, Incorporated
Corn Milling Division
3201 Needmore Road, Dayton, Ohio 45414
Response to U.S. EPA's Request for Information
Dated May 24, 1993
Regarding
IWD Sanitary Landfill
Cardington Road, Moraine, Ohio

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

The following individuals were consulted in the preparation of the answers to the July 17, 1987, information requests. Additional consultations were recently conducted to reaffirm certain pieces of information; however, no new individuals were contacted in preparation of the current response.

Sheila Willhoite, Special Projects Manager, Cargill, Incorporated, Corn Milling Division, 3201 Needmore Road, Dayton, Ohio 45414. Ms. Willhoite was Facility Accounting Manager at the time Cargill's August 14, 1987, response to EPA's request for information was prepared. Responsibilities of the Facility Accounting Manager include conducting administrative and financial aspects of plant operations, and including completion of special projects.

Art Andrade, Plant Purchasing Agent, Cargill, Incorporated, Corn Milling Division, 3201 Needmore Road, Dayton, Ohio 45414. Mr. Andrade was Plant Purchasing Manager at the time Cargill's August 14, 1987, response to EPA's request for information was prepared. Responsibilities of the Plant Purchasing Manager include procuring waste haulers for disposal of plant waste materials and negotiating cost arrangements for same.

Janice Hannan, Facility Accounting Manager, Cargill, Incorporated, 1710 16th Street S.E., Cedar Rapids, Iowa 52406. Ms. Hannan was an Accounting Trainee at the time Cargill's August 14, 1987, response to EPA's request for information was prepared. Responsibilities of an Accounting Trainee included special projects, specifically, reviewing and retrieving accounting and waste disposal documents responsive to EPA's 1987 request for information.

Janice Richards (formerly known as Janice Fong), Environmental Engineer, Cargill, Incorporated, Corn Milling Division, 3201 Needmore Road, Dayton, Ohio 45414. Responsibilities of the Environmental Engineer include, among other things, responding to EPA or state agency requests for information relating to waste disposal practices. Ms. Richards is knowledgeable about wastes currently generated by the facility and their characteristics, as well as about waste handling practices generally at the facility; however, she is not personally familiar with waste disposal by Cargill at the IWD Sanitary Landfill facility.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.

In preparation of Cargill's response dated August 14, 1987, to U.S. EPA's request for information dated July 14, 1987, we examined MSDSs, billing records, invoices, and waste pick-up tickets. As a result of this search, documents were located and submitted to the U.S. EPA for the period 1974 through 1982.

According to information contained in U.S. EPA's July 14, 1987, letter, the IWD Sanitary Landfill reached fill capacity and was closed in 1980. Because the landfill was closed in 1980, no new or additional information or documents relating to disposal at the IWD facility would have been generated after the 1987 search was conducted; thus, no additional document search was conducted in preparation of this response.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Cargill, Incorporated, has no information responsive to this request.

4. List the EPA Identification Numbers of the Respondent.

OHD 061698676.

5. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom.

Cargill, Incorporated, has no information responsive to this request.

6. Identify all persons who have or may have knowledge or information about the generation, transportation, or disposal of hazardous substances by you, your contractors, or by prior owners and operators at the Site.

Cargill, Incorporated, has no information responsive to this request.

7. Did you ever dispose, transport for disposal, or arrange for the transportation for disposal of any hazardous substances or other materials at the Site? U.S. EPA is in possession of information showing that Respondent was a customer of Industrial Waste Disposal, Inc. ("IWD") and that disposal transactions were conducted with IWD on the following dates: 2/20/75, 11/6/75, 4/9/75, 3/18/75, 4/8/75, 4/18/75, 10/8/75, 2/25/75, 3/18/75, 5/24/75. U.S. EPA's information indicates that IWD disposed of Respondent's waste at the Site. For each of these transactions, and any other transactions which are responsive to this request, please provide the following:

a) The name, chemical composition, characteristics, and physical state (e.g., solid, liquid) of each hazardous substance, and the process for which the hazardous substance or material was used or the process which generated the hazardous substance or material;

Not applicable. Cargill disposed of no hazardous substances or hazardous materials through IWD.

b) Each date when such hazardous substances or other materials were disposed or transported for disposal by you, your contractors, or by any other person;

Not applicable. Cargill disposed of no hazardous substances or hazardous materials through IWD.

c) The quantity of the material involved (weight or volume) in each transaction and the total quantity for all transactions;

Please refer to invoices and pick-up tickets provided with our August 14, 1987, response for quantities of non-hazardous materials removed from our facility by IWD.

d) All tests or analyses and analytical results concerning each hazardous substance or material;

Not applicable. Cargill disposed of no hazardous substances or hazardous materials through IWD.

e) The price charged for transport and/or disposal per drum, barrel, container, load (or whatever unit used) of waste materials brought to the Site.

Please refer to invoices and pick-up tickets provided with our August 14, 1987, response for prices charged for disposal or transport of non-hazardous materials.

8. Identify all persons, including yourself, who may have arranged for disposal or arranged for transportation for disposal of waste materials, including hazardous substances, to the Site. In addition, identify the following:

Mr. Art Andrade arranged with IWD for disposal of non-hazardous waste from the date of his employment in 1978. See response to question 1 above for further information.

a) The persons with whom you or such other persons made such arrangements;

Cargill, Incorporated has no information responsive to this request.

b) Every date on which such arrangements took place.

Please refer to Cargill's response dated August 14, 1987, for requested dates. Cargill, Incorporated has no further information responsive to this request.

c) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported and disposed;

The transporter of our non-hazardous waste, Industrial Waste Disposal, selected the Site for disposal.

d) The amount paid in connection with each transaction;

Please refer to invoices and pick-up tickets provided with our August 14, 1987, response for amounts paid for disposal of non-hazardous materials.

e) What was actually done to the waste materials or hazardous substances once they were brought to the Site;

No hazardous substances were transported to or disposed of at this site from Cargill's facility. Cargill has no information responsive to the question with respect to its non-hazardous waste.

f) The measures taken by you to determine the actual methods, means, and site of disposal of the waste material and hazardous substances involved in each transaction;

No hazardous substances were transported to or disposed of at this site from Cargill's facility. Cargill has no information responsive to the question with respect to its non-hazardous waste, which is not unusual, even today, for non-hazardous waste disposal.

g) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers.

No hazardous substances were transported to or disposed of at this site from Cargill's facility. Cargill has no information responsive to the question with respect to its non-hazardous waste. The non-hazardous wastes transported from Cargill's facility were contained in roll-off boxes or luggers which were picked up by the transporter. The number of these roll-off boxes and luggers transported are identified on the pick-up tickets submitted with our August 14, 1987, response. Cargill, Incorporated, has no information regarding the types of containers used after the transporter left our facility, if any, or regarding the markings on such containers, if any.

(8539)

CARGILL Certified Mail

Milling Division

3201 Needmore Road
P.O. Box 1400A
Dayton, Ohio 45414
513/236-1971

June 28, 1993

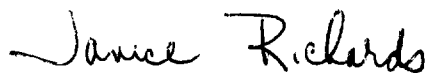
Mr. Kevin Turner
Remedial Project Manager
U.S. Environmental Protection Agency, HSRM-6J
77 W. Jackson Blvd.
Chicago, Illinois 60604

Dear Mr. Turner:

Enclosed is Cargill, Incorporated's response to U.S. EPA, Region V's Request for information, dated May 24, 1993 regarding the Sanitary Landfill Company (IWD) Site in Moraine, Ohio.

If you have any questions, please contact me at 513-237-1248.

Sincerely,



Janice Richards
Environmental Engineer